

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

UNITED STATES *ex rel.*  
BONNIE ELSDON,

C.A. No. 4:18-cv-01766

*Qui tam* Plaintiff,

JURY TRIAL DEMANDED

v.

U.S. PHYSICAL THERAPY, INC.; U.S. PHYSICAL  
THERAPY, LTD.; THE HALE HAND CENTER,  
LIMITED PARTNERSHIP, LLC; REHAB  
PARTNERS #2, INC.; and SUZANNE HALE,

Defendants

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**NOTICE OF CORRECTION**

*Qui tam* Relator Bonnie Elsdon (“Relator”), files this Notice of Correction with respect to the Amended Complaint (D.E. 5), showing as follows:

The Amended Complaint names as a Defendant “The Hale Hand Center,” in various iterations. The correct name of this Defendant is “The Hale Hand Center, Limited Partnership,” but in the caption included “LLC,” and in Section I., paragraph 1, included “Inc.” so there was no actual confusion about the entity named, just two erroneous references to the type of entity. By this Notice, Relator corrects the name of Defendant The Hale Hand Center, Limited Partnership, where it appears, to show its correct name, then as corrected, defined as its short name “Hale”.

Location in Complaint	Stated Name	Correct Name
Caption	The Hale Hand Center, Limited Partnership, LLC	The Hale Hand Center, Limited Partnership
Section I., para. 1.	The Hale Hand Center Limited Partnership, Inc.	The Hale Hand Center, Limited Partnership (“Hale”)

Location in Complaint	Stated Name	Correct Name
Section V., para. 84	the Hale Hand Center, Inc.	Hale
Section V., para. 85	the Hale Hand Center	
Section V., para. 88	Hale Hand Center	
Section V., para. 98	Hale Hand Center (two instances)	
Section V., para. 101	the Hale Hand Center	
Section V., para. 102	The Hale Hand Center (three instances)	
Exhibit K	Hale Hand Center	

Respectfully submitted,

**DAVID S. TOY PLLC**

/s/ David S. Toy

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*Attorneys for Qui tam Relator, Bonnie Elsdon*

**CERTIFICATE OF SERVICE**

I certify a copy of the foregoing was served on all counsel of record, and including on the United States, by delivery to Andrew Bobb, Assistant United States Attorney, United States Attorney's Office, Southern District of Texas, pursuant to the Federal Rules of Civil Procedure, on this 2<sup>nd</sup> day of October, 2019.

/s/ David S. Toy

David S. Toy